# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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| § | Civil Action No. 4:13-cv-2478 |
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| § | Judge: Hon. Lee Rosenthal     |
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#### **JOINT MOTION TO STAY**

The parties jointly file this motion to stay all discovery and proceedings in this lawsuit until June 16, 2014. The parties have reached a confidential settlement agreement that is subject to conditions that are contemplated to be completed by June 16. Subject to compliance with the terms of the parties' settlement agreement, the parties anticipate jointly moving to dismiss this lawsuit without prejudice on June 16, 2014.

This motion is, therefore, filed for good cause, and the parties jointly request that the Court grant this motion and stay all deadlines, discovery and other proceedings in this case until June 16, 2014.

A proposed order granting this joint motion is filed herewith.

Dated this 28th day of April, 2014.

Respectfully Submitted,

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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.3.

s/Joseph M. Beauchamp